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Attorneys for Defendant David Perez-Manchame

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA

UNITED STATES OF AMERICA,)	No. 2:19-cr-103-JCM-VCF
)	
Plaintiff,)	Joint Stipulation To Continue Arraignment
)	& Plea On Superseding Indictment From
v.)	August 10, 2021 at 1:00 pm to August 31,
)	2021 For Defendants Reyes-Castillo &
JOSE LUIS REYNALDO)	Perez-Manchame
REYES-CASTILLO, and)	
DAVID ARTURO PEREZ-MANCHAME,)	
)	
Defendants.)	

Plaintiff United States of America, and Defendants Jose Luis Reynaldo Reyes-Castillo, and David Arturo Perez-Manchame, through their respective attorneys, hereby stipulate that the Arraignment and Plea, in response to the superseding indictment (ECF No. 69, sealed) returned on August 4, 2021 (ECF No. 74), presently scheduled for Tuesday, August 10, 2021 at 1:00 p.m. (ECF No. 74),, should be continued to **August 31, 2021 at _____**. The continuance will have no impact on the Speedy Trial Act as time under that Act has been excluded up to and including February 07, 2022 (ECF No 52) and the parties contemplate meeting and conferring to amend the present complex case scheduling order (ECF No. 55) entered on January 5, 2021.

Good cause exists to grant this stipulation for the following reasons.

First, August 31, 2021 is a date in which counsel for both Mr. Reyes-Castillo and Mr. Perez-Manchame, and their respective counsel, and government counsel, all can appear for the respective arraignments and pleas of not guilty for Mr. Reyes-Castillo and Mr. Perez-Manchame. Mr. Kennedy, counsel for Mr. Perez-Manchame, is out-of-state working beginning August 7, 2021 and returning August 17, 2021, and thus, he is unavailable for the scheduled August 10, 2021 A&P date. Counsel for Mr. Reyes-Castillo, Mr. Wright, is too out-of-town on August 10, 2021. Counsel for the United States, Mr. Torgoley, has conflicts on August 18 through August 20, 2021. Counsel for Mr. Perez-Manchame, Ms. Luem, is out-of-state the week of August 23, 2021 through August 27, 2021, attending to a family personal matter.

Second, counsel for Mr. Perez-Manchame has a previous scheduled in-person attorney-client meeting on August 30, 2021 with a federally certified interpreter. During this meeting, counsel will be able to have the interpreter read the superseding indictment to Mr. Perez-Manchame in his native language (Spanish) and prepare him for the August 31, 2021 A&P hearing. Continuing the A&P hearing from August 10, 2021 to August 31, 2021 will also permit counsel for Mr. Reyes-Castillo to do the same. Finally, the superseding indictment remains sealed at this time and the continuance will permit counsel for the defendants to obtain it and review the same with their respective clients prior to the A&P hearing.

Dated: August 5, 2021.

Respectfully submitted,

CHRISTOPHER CHIOU
Acting United States Attorney
/s/ Shaheen P. Torgoley
SHAHEEN P. TORGOLEY
Assistant U.S. Attorney
Counsel for United States

/s/ John Balazs
RICHARD A. WRIGHT
JOHN BALAZS
MONTI J. LEVY
Counsel for defendant
JOSE LUIS REYES-CASTILLO

DAVID L. JAFFE
Chief, Organized Crime & Gang Section
U.S. Department of Justice
/s/ Jeremy Franker
JEREMY FRANKER
CHRISTOPHER TAYLOR
Trial Attorneys
Counsel for United States

/s/ Michael J. Kennedy
ANDREA L. LUEM
MICHAEL J. KENNEDY
Counsel for defendant
DAVID ARTURO PEREZ-MANCHAME

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

v.

JOSE LUIS REYNALDO
REYES-CASTILLO, and
DAVID ARTURO PEREZ-MANCHAME,

Defendants.

No. 2:19-cr-103-JCM-VCF

**Order Continuing Arraignment & Plea For
Defendants Jose Luis Reynaldo Reyes-
Castillo and David Arturo Perez-
Manchame From August 10 to August 31**

Presently before the court in the matter of United States v. Reyes-Castillo, case number 2:19-cr-103-JCM-VCF, is a stipulation between the United States and defendants Jose Luis Reynaldo Reyes-Castillo, and David Arturo Perez-Manchame.

For good cause shown, IT IS ORDERED that the arraignment and plea for Mr. Reyes-Castillo and Mr. Perez-Manchame for August 10, 2021 at 1:00 p.m. is vacated and re-scheduled for August 31, 2021 at 2:30 PM.

IT IS SO ORDERED:


United States Magistrate Judge

8-6-2021
Date

CERTIFICATE OF SERVICE

The undersigned certifies that he is a person of such age and discretion as to be competent to serve papers and that he served a copy of the foregoing through the Electronic Filing System to all parties.

/s/ Michael Kennedy
Law Offices of Michael Jerome Kennedy, PLLC